



September 28, 2000

**Federal Express**

Ms. Julie Spyers  
U. S. EPA  
The Performance Track Information Center  
C/O Industrial Economics Incorporated  
2067 Massachusetts Avenue  
Cambridge, MA 02140

Dear Ms. Spyers:

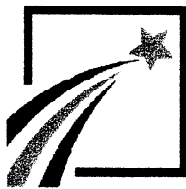
Enclosed are applications from four (4) 3M facilities for participation in U. S. EPA's National Environmental Achievement Track Program. Those four facilities are:

- 1) 3M Dental Products Division Facility in Irvine, CA ~~A09-0016~~
- 2) 3M Electrical Products Division Facility in New Ulm, MN ~~A05-0039~~
- 3) 3M Traffic Control Materials Division Facility in Brownwood, TX ~~A06-0048~~
- 4) 3M Traffic Control Materials Division Facility in Guin, AL ~~A04-0042~~ A04-0045

These facilities have achieved and continue to achieve positive environmental results through a series of environmental management programs such as environmental management systems (EMS's), 3M's Pollution Prevention Pays (3P) Program and our Corporate research and development efforts. They represent only a few of 3M's facilities, all of which are good corporate citizens in the communities in which 3M employees live, work and play. As such, we believe them to be excellent candidates for participation in your National Environmental Achievement Track Program. As the program develops several more of our facilities may want to become involved.

I am the main contact person for coordination of 3M's participation in the Program however; you may also contact any of the individuals listed on the front of the application forms for information concerning each of the facilities for which they have responsibility. 3M looks forward to being a part of this important program and to bringing about even better environmental performance at all of our facilities.

Sincerely,  
Jeffrey C. Muffat  
Senior Environmental Regulatory Specialist



A04-004115

***National  
Environmental  
Achievement Track***

***Application Form***

**3M Guin**

Name of facility

**3M (Minnesota Mining and Manufacturing) Company**

Name of parent company (if any)

**6675 U.S. Highway 43**

Street address

Street address (continued)

**Guin, Alabama 35563**

City/State/Zip code

Give us information about your contact person for the  
National Environmental Achievement Track Program.

Name **James R. Kotsmith**

Title **Advanced Environmental Engineer**

Phone **651-778-4263**

Fax **651-778-7203**

E-mail **jrkotsmith@mmm.com**

***Why do we need this information?***

EPA needs background information on your facility to evaluate your application.

***What do you need to do?***

- Provide background information on your facility.
- Identify your environmental requirements.

# Section A

*Tell us about your facility.*

1 What do you do or make at your facility?

3M Guin is a manufacturing facility located in Guin, Alabama. The facility began operation in 1955 and produces an array of reflective products for the global transportation safety industry. These products include reflective sheeting for traffic signing, commercial applications and pavement marking. The facility also produces glass bubbles for use in fillers and the explosives industry.

2 List the Standard Industrial Classification (SIC) code(s) or North American Industrial Classification System (NAICS) codes that you use to classify business at your facility.

SIC  
3992 3229

NAICS

3 Does your company meet the Small Business Administration definition of a small business for your sector?

☐ Yes ☒ No

4 How many employees (full-time equivalents) currently work at your facility?

- ☐ Fewer than 50  
☐ 50-99  
☒ 100-499  
☐ 500-1,000  
☐ More than 1,000

## Section A, continued

5 Does your facility have an EPA ID number(s)?

☒ Yes

☐ No

If yes, list in the right-hand column.

ALD004019691 – Hazardous Waste ID #

AL0065331 – Plant NPDES (Stormwater)

ALG160037 – Landfill NPDES (Stormwater)

6 Identify the environmental requirements that apply to your facility. Use the Environmental Requirements Checklist, at the back of the instructions, as a reference. List your requirements to the right *or* enclose a completed Checklist with your application.

See attached form

7 Check the appropriate box in the right-hand column.

☒ I've listed the requirements above.

☐ I've enclosed the Checklist with my application.

8 Optional: Is there anything else you would like to tell us about your facility?

3M Worldwide, including 3M Guin, has long been involved and committed to pollution prevention and emissions reduction programs. Since 1975, 3M worldwide has developed over 3,000 projects that have prevented over 1 billion pounds per year of pollution with a corresponding savings of over \$500 million. 3M Guin has developed over 25 major projects, as a part of 3M's Pollution Prevention Pays (3P) Program, to prevent almost 2 million pounds per year of air pollution and almost 8 million pounds per year in the generation of solid and/or hazardous waste. 3M Guin has reduced its air emissions by over 74 percent since 1991, as the result of voluntarily installing two thermal oxidizers on its major grandfathered air emission sources.

***Why do we need this information?***

Facilities must have an operating Environmental Management System (EMS) that meets certain requirements.

***What do you need to do?***

- Confirm that your EMS meets the Achievement Track requirements.
- Tell us if you have completed a self-assessment or have had a third-party assessment of your EMS.

# Section B

*Tell us about your EMS.*

1 Check *yes* if your EMS meets the requirements for each element below as defined in the instructions.

a. Environmental policy ☒ Yes

b. Planning ☒ Yes

c. Implementation and operation ☒ Yes

d. Checking and corrective action ☒ Yes

e. Management review ☒ Yes

2 Have you completed at least one EMS cycle (plan-do-check-act)? ☒ Yes

3 Did this cycle include both an EMS and a compliance audit? ☒ Yes

4 Have you completed an objective self-assessment or third-party assessment of your EMS? ☒ Yes

If yes, what method of EMS assessment did you use?

☐ Self-assessment

☐ GEMI

☐ Other

☐ CEMP

☒ Third-party assessment

☒ ISO 14001 Certification

☐ Other

### ***Why do we need this information?***

Facilities must show that they are committed to improving their environmental performance. This Means that you can describe past achievements and will make future commitments.

### ***What do you need to do?***

Refer to the Environmental Performance Table in the instructions to answer questions 1 and 2.

# ***Section C***

***Tell us about your past achievements and future commitments.***

- 1** Describe your past achievements for at least two environmental aspects. If you need more space than is provided, attach copies of this page.

**Note to small facilities:** If you qualify as a small facility as defined in the instructions, you are required to report past achievement for at least one environmental aspect.

### ***First aspect you've selected***

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
TRI Emissions	912,475	pounds	592,025	pounds
<p>i. How is the current level an improvement over the previous level?</p> <p>The facility has reduced the releases of TRI chemicals to the environment.</p>				
<p>ii. How did you achieve this improvement?</p> <p>The TRI emission reduction was achieved by reformulating products that eliminate or use low amounts of TRI materials, voluntary pollution control equipment, and production improvements related to material usage and product yield.</p>				

***Second aspect you've selected***

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
Plant Waste Ratio	Quantity 31.2 %	Units waste/material throughput	Quantity 25.1 %	Units waste/material throughput
<p>i. How is the current level an improvement over the previous level?</p> <p>The facility was able to reduce the waste generated : material throughput ratio by 6%. This resulted in an improved use of landfill space and natural resources.</p>				
<p>ii. How did you achieve this improvement?</p> <p>These improvements were achieved by implementing quality and yield improvements, increasing recycling efforts, product reformulation and developing new material reuse projects.</p>				

- 2 Select at least four environmental aspects (no more than two from any one category) from the Environmental Performance Table in the instructions and then tell us about your future commitments. If you need more space than is provided, attach copies of this section.

**Note to small facilities:** If you are a small facility, you are required to make commitments for at least two environmental aspects in two different categories.

***First aspect you've selected***

- a. What is the aspect? Solid waste from glass bubble production
- b. Is this aspect identified as significant in your EMS? ☒ Yes ☐ No
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- ☐ Option A:  
Absolute value
- ☒ Option B:  
In terms of units of production or output
- 6.5% waste ratio\* =  
waste/total process throughput  
(Quantity/Units)

## Section C, continued

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

☐ Option A:  
Absolute value

☒ Option B:  
In terms of  
units of production  
or output

3.0% waste ratio\* =  
waste/total process  
thoroughput  
(Quantity/Units)

e. How will you achieve this improvement?

The facility is implementing a baghouse dust reuse project.

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### Second aspect you've selected

a. What is the aspect?

Solid waste from converting

b. Is this aspect identified as significant in your EMS?

☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

☐ Option A:  
Absolute value

☒ Option B:  
In terms of  
units of production  
or output

35.0% waste ratio\* =  
waste/total process  
thoroughput  
(Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

☐ Option A:  
Absolute value

☒ Option B:  
In terms of  
units of production  
or output

21.8% waste ratio\* =  
waste/total process  
thoroughput  
(Quantity/Units)

e. How will you achieve this improvement?

The facility plans to improve product yield and develop new material reuse projects.



***Third aspect you've selected***

- a. What is the aspect? **Maker VOC emissions**
- b. Is this aspect identified as significant in your EMS? ☐ Yes ☒ No
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- ☐ Option A:  
Absolute value
- ☒ Option B:  
In terms of units of production or output **1.45% VOC Emissions Ratio\* = VOCs emitted/total process throughput (Quantity/Units)**
- d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.
- ☐ Option A:  
Absolute value
- ☒ Option B:  
In terms of units of production or output **1.30% VOC Emissions Ratio\* = VOCs emitted/total process throughput (Quantity/Units)**
- e. How will you achieve this improvement? **The facility plans to meet this goal through product reformulation and emission control optimization.**
- 

***Fourth aspect you've selected***

- a. What is the aspect? **Energy Consumption**
- b. Is this aspect identified as significant in your EMS? ☐ Yes ☒ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

☐ Option A:  
Absolute value

☒ Option B:  
In terms of  
units of production  
or output

1.16% MMBTU energy/  
lb material processed  
(Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

☐ Option A:  
Absolute value

☒ Option B:  
In terms of  
units of production  
or output

1.04% MMBTU energy/  
lb material processed  
(Quantity/Units)

e. How will you achieve this improvement?

The facility will implement energy conservation plans and develop less-energy intensive processing methods.

### ***Why do we need this information?***

Facilities must demonstrate their commitment to public outreach and performance reporting. You should have appropriate mechanisms in place to identify community concerns, to communicate with the public, and to provide information on your environmental performance.

# ***Section D***

***Tell us about your public outreach and reporting.***

### ***What do you need to do?***

- Describe your approach to public outreach.
- List three references who are familiar with your facility.

1 How do you identify and respond to community concerns?

All community communications are responded to by the EHS department during business hours or the security guard records information during non-business hours for response by the EHS department. The plant manager or public relations department is responsible all media communications.

2 How do you inform community members of important matters that affect them?

The plant manager informs the community and business leaders about plant matters at local meetings. Plant EHS staff will inform inquiring community members as described above.

3 How will you make the Achievement Track Annual Performance Report available to the public?

☐ Website [www.](#)

☒ Newspaper

☐ Open Houses

☒ Other

Available for public viewing at city hall and the local library.

**Section D, continued**

- 4 Are there any ongoing citizen suits against your facility?

☐ Yes ☒ No

If yes, describe briefly in the right-hand column.

- 5 List references below

	<i>Organization</i>	<i>Name</i>	<i>Phone number</i>
<i>Representative of a Community/Citizen Group</i>	Marion County Emergency Management Administrator	D.D. Real	(205) 921-4555
<i>State/Local Regulator</i>	Alabama Department of Environmental Management	Kevin Fulmer Raymond Love	(334) 271-7861 (256) 353-1713
<i>Other community/local reference</i>	City of Guin, City Council	Phil Segraves	(205)468-2713

On behalf of 3M Guin  
[my facility],

I certify that

# Section E

*Application and  
Participation Statement*

- I have read and agree to the terms and conditions, as specified in the *National Environmental Achievement Track Program Description* and in the *Application Instructions*;
- I have personally examined and am familiar with the information contained in this Application (including, if attached, the Environmental Requirements Checklist). The information contained in this Application is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no reason to believe the facility would not meet all program requirements;
- My facility has an environmental management system (EMS), as defined in the Achievement Track EMS requirements, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements, in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;
- My facility has conducted an objective assessment of its compliance with all applicable federal, state, tribal, and local environmental requirements, and the facility has corrected all identified instances of potential or actual noncompliance;
- Based on the foregoing compliance assessment and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Achievement Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Signature/Date 

Printed Name/Title Ronald L. Schalk, Plant Manager

Facility Name 3M Guin

Facility Street Address 6675 U.S. Highway 43, Guin, Alabama 35563

Facility ID Numbers ALD004019691, AL0065331, ALG160037

**3M Guin Applicable Environmental Regulations**  
**National Environmental Achievement Track Application**

***Applicable Federal Rules***

<b>Applicable Regulation</b>	<b>Regulation Title - Description (where necessary)</b>
29 CFR 1926.62	OSHA Construction Standards for Lead - This facility is subject to construction work where an employee may be exposed to lead.
40 CFR 51 40 CFR 52	PSD - This facility is located in an attainment area and construction/modification projects may trigger a PSD review
40 CFR 60	NSPS - This facility is subject to the general provisions and subparts Dc, Kb and RR related to boilers, storage tanks, and pressure sensitive tape and labels.
40 CFR 61	NESHAP - This facility is subject to the general provisions and subpart M related to demolition and renovation of asbestos containing areas.
40 CFR 68	RMP - This facility is subject to the general duty clause this rule. This facility does not have any processes containing regulated substances above designated threshold quantities and is not required to submit a risk management plan to the EPA.
40 CFR 70	Title V Operating Permit - This facility is in the process of obtaining a Title V Permit.
40 CFR 82.150	Refrigerant Management - This facility is subject to the service, maintenance, repair, and disposal requirements of this rule.
40 CFR 112	Oil Pollution Prevention - SPCC Plan
40 CFR 122.26	NPDES Stormwater Discharges - This facility has a stormwater permit.
40 CFR 261	Identification and Listing of Hazardous Waste
40 CFR 262	Standards Applicable to Generators of Hazardous Waste
40 CFR 264/ 40 CFR 265	Standards for Owners and Operators of TSD facilities - This facility is subject to subparts J, BB and CC related to tank systems, air emission standards for equipment leaks and air emission standards for tanks and containers.
40 CFR 268	Land Disposal Restrictions
40 CFR 273	Standards for Universal Waste Management
40 CFR 279	Standards for the Management of Used Oil
40 CFR 302 40 CFR 355	EPCRA 304 - This facility has listed chemicals on site subject to the reporting obligations for releases of the listed chemicals.
40 CFR 355	EPCRA 302 - This facility stores materials on site that are listed by the EPA as an extremely hazardous substance (EHS) above the threshold planning quantities.
40 CFR 370	EPCRA 311/312 - This facility has reportable quantities of chemicals on-site subject to submission of 311 and 312 reports to the LEPC, SERC, and local fire departments.
40 CFR 372	EPCRA 313 - This facility manufactures, processes, or otherwise uses listed chemicals that require submission of a Form R report.

**3M Guin Applicable Environmental Regulations**  
**National Environmental Achievement Track Application**

***Applicable State (Alabama) Rules***

Applicable Regulation	Regulation Title - Description (where necessary)
335-3-1	Air Pollution General Provisions
335-3-2	Air Pollution Emergency
335-3-3	Open Burning
335-3-4	Control of PM Emissions - This facility is subject to the visible emissions, fugitive dust and emissions, fuel burning equipment, and general process industries requirements of this regulation.
335-3-5	Control of Sulfur Compound Emissions - This facility is subject to the regulations from fuel combustion and general process industries.
335-3-6	Control of Organic Emissions - This facility is subject to the loading/storage provisions of this section.
335-3-10	NSPS - This facility is subject to NSPS Subpart Dc and RR. This regulation incorporates 40 CFR 60.
335-3-14	Permit Procedure and Standards - This facility currently holds several ADEM permits that are subject to these provisions.
335-3-16	Major Source Operating Permits - This facility is a major stationary source subject to ADEM operating permit requirements.
335-6-1	Water Pollution General Provisions/Definitions
335-6-5	State Indirect Discharge Permit and Pretreatment Rules - This facility is not a "significant industrial user." The facility is required to comply with the pretreatment standards and prohibitions prior to discharge to the City of Guin Wastewater Treatment system.
335-6-6	NPDES - This facility has a stormwater discharge permit and is subject to the requirements of this regulation and 40 CFR 122.26.
335-6-10	Water Quality Criteria - This facility has a stormwater permit subject to these requirements.
335-6-11	Water Use Classifications - This facility has surrounding water, which has been classified by the state of Alabama, as PWS (Public Water Supply) and OAW (Outstanding Alabama Water).
335-6-16	UST and AST Tank Trust Fund - At this facility, three tanks are eligible for the AST Trust Fund. These tanks are currently registered with ADEM.
335-7-9	Water Connection Control Requirements - This facility has installed a backflow prevention device on each service connection where a potential health hazard could exist.
335-13-7	Untreated Medical Waste - Medical waste is packaged by the on-site medical staff and sent to an approved treatment facility.
335-14-1	Hazardous Waste Management General Rules - This facility is a large quantity generator subject to ADEM state hazardous waste rules.
335-14-2	Identification and Listing of Hazardous Waste
335-14-3	Standards for Generators of Hazardous Waste and/or Other Waste
335-14-5	Standards for Owners and Operators of TSD Facilities
335-14-6	

**3M Guin Applicable Environmental Regulations**  
**National Environmental Achievement Track Application**

***Applicable State (Alabama) Rules Continued***

<b>Applicable Regulation</b>	<b>Regulation Title - Description (where necessary)</b>
335-14-7	Standards for the Management of Specific Hazardous Waste
335-14-9	Land Disposal Restrictions
335-14-11	Universal Waste Management
335-14-17	Standards for the Management of Used Oil





November 10, 2000

Ms. Julie Spyers  
U. S. EPA  
The Performance Track Information Center C/O Industrial Economics Incorporated  
2067 Massachusetts Avenue  
Cambridge, MA 02140

Dear Ms. Spyers:

This letter is to provide you some updated information regarding our applications for the National Environmental Achievement Track for the 3M Traffic Control Materials Division Facilities in Guin, AL and Brownwood, TX.

Subsequent to the completion and submission of our applications for those facilities, 3M completed a self-assessment of its program under the RCRA Subpart BB/CC regulations. This self-assessment was conducted pursuant to the U. S. EPA Audit Policy. On Friday, November 3, 2000, 3M submitted the results of that assessment to U. S. EPA. Included in the results were findings indicating that both Guin's and Brownwood's programs had minor deficiencies in need of corrective action. Those deficiencies have either already been addressed or will be shortly.

We provide this information to you in the spirit of full disclosure regarding our applications. Please contact me should you need further information.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeffrey C. Muffat".

Jeffrey C. Muffat  
Senior Environmental Regulatory Specialist